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January 10, 2014

BY FACSIMILE 202-219-3496

Federal Election Commission  
 Reports Analysis Division  
 Attn: Jill Sugarman  
 Sr. Campaign Finance & Reviewing Analyst  
 999 E Street, NW  
 Washington, DC 20463

Re: October Quarterly Report (07/01/2012 – 09/30/2012)

Dear Ms. Sugarman:

This letter is in response to the RFAI that the American Principles in Action has received regarding independent expenditures that appear on APIA's October Quarterly Report, but that do not appear on 48-hour reports. 13 JAN '14 RCVD

The individual who was responsible for filing APIA's FEC reports left the organization shortly after filing the October Quarterly Report in 2012. The officer responsible for supervising this individual also left the organization around the same time. The recordkeeping was in disarray upon the departure of these two individuals, making it difficult for APIA to determine why the 48-hour reports were not filed.

It is difficult for APIA to reconcile why no 48-hour reports were filed for the disbursements listed on the October Quarterly Report, and a 48-hour report was filed for an ad that ran on October 15 (see 48-hour report filed on October 17, 2012).

APIA believes that the dates listed in the October Quarterly Report are payment dates. APIA ran ads during the weeks of 8/6/12, 8/13/12, 9/17/12, and 9/24/12.

APIA has retained my firm to handle any future FEC reporting issues to ensure that timely and accurate reports are filed. Had APIA been aware of the failure to file these 48-hour reports, it would have self-disclosed such failure; APIA previously disclosed its failure to file a 24-hour report for an independent expenditure that unknowingly ran the week of October 22, 2012. See ADR 633 (P-MUR 553).

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